

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

INTERFOCUS INC., A California  
Corporation,

Plaintiff,

v.

The Defendants Identified in SCHEDULE  
A,

Defendant.

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

**RESPONSE TO DOCKET NO. 23**

Plaintiff Interfocus Inc. responds to this Court's Order to show cause why the caption should not be changed to reflect the names of the Defendants. The purpose of placing the names of the Defendants under seal was to prevent the Defendants from secreting assets to prevent the satisfaction of a judgment in this case. *See* Dkt. 10 at 11-14; Dkt. 17, *passim*. Plaintiff does not object to changing the caption on or after October 17, 2022, for the reasons set forth below.

Plaintiff served Defendants on October 6, 2022 in accordance with paragraph 5 of the Sealed Temporary Restraining Order ("Order") issued by this Court on October 4, 2022. Dkt. 22 at 5, ¶ 5. Plaintiff gave notice of this Order to all Third Party Payment Processors by October 7, 2022. Dkt. 22 at 4, ¶ 3. The Order requires Third Party Payment Processors to "locate all accounts and funds connected to Defendants" and "restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court" by no later than 10 days after the date of receipt of the Order. Dkt. 22 at 4, ¶ 3.

Plaintiff does not object to changing the caption of this case to reflect the names of the Defendants on or after October 17<sup>th</sup>, which is ten days from the date on which all of the Third-Party Payment Processors were given notice of this Court's Order of October 4, 2022, pursuant to Dkt. 22 at 4. This will give the Third Party Payment Processors the 10 days to freeze Defendants' assets, as set forth in the Order at page 4, ¶ 3, before the caption is publicly changed.

Date: October 7, 2022

Respectfully submitted,

RIMON, P.C.

/s/ Eric C. Cohen

Ill. ARDC No. 0473685  
Rimon P.C.  
980 N. Michigan Ave., Suite 1400  
Chicago, IL 60611  
Telephone: (984) 960-2860  
Email: eric.cohen@rimonlaw.com

Mark S. Lee  
Rimon, P.C.  
2029 Century Park East, Suite 400N  
Los Angeles, CA 90067  
Telephone: 310.561.5776  
Email: mark.lee@rimonlaw.com

Zheng Liu  
Rimon P.C.  
800 Oak Grove Ave., Suite 250  
Menlo Park, CA 94025  
Telephone: (650) 382-4546  
Email: zheng.liu@rimonlaw.com

Attorneys for Plaintiff, INTERFOCUS INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 7, 2022, this document was filed with the Clerk of the Court using CM/ECF, which will send notification of the filing to all attorneys of record in this case; and a copy of this document was served on Defendants by adding it to the published link in the manner prescribed by the Court's October 4, 2022 Order, Dkt. 22, ¶ 5.

/s/ Eric C. Cohen  
Eric C. Cohen